



July 20, 2016

Public Comment on Portland Superfund Site.

I am Rob Rich, the V.P. of Marine Services for Shaver Transportation Company. We are a family owned 5th generation 136 year old tug and barge line. We employ 100 people engaged in providing tug services for the Columbia Snake River system, and are headquartered at WR mile 8.2.

We have been a PRP since the beginning of this process some 15 years ago. At the time, we were lead to believe that in 3 to 5 years the harbor would be characterized, a cleanup plan would be organized, and remediation would begin. That was 15 years ago.

As a small company with only one business line, it has been impossible for us to prepare for what the eventual outcome of this remedy would be and to estimate its cost to us, let alone our survivability as a company due to this. What on the surface seems like an equitable process: identify and allocate responsibility, then divide cost for payment is anything but.

Proposing remediation levels that are below current background levels of presence for some contaminants, along with high fish consumption estimates for a very small segment of the population create a basically unattainable level of remediation to be borne by the currently identified operators along the river.

It is true that there are hot spots of contamination that need to be addressed. It is also true that there are considerable volumes of fresh contamination currently entering the Portland harbor, not only from the local area, but upriver, beyond the Superfund site, from the hundreds of square miles drained by the Willamette River and its tributaries.

We ask that EPA focus on a reasonable and scientifically supportable program selection for our harbor and understand that we are not just companies, but individual people that depend on the river and its' vitality for our livelihoods.

Best regards,

Rob Rich
Shaver Transportation Company



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